

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Dean Langford and Nancy Langford,
husband and wife,

Plaintiffs,

v.

Zimmer Holdings, Inc.,

Defendant.

Civ. No. 03-CV-12245RCL

ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE OF JAMES REECE

Pursuant to Local Rule 83.5.3(b), Plaintiffs Dean and Nancy Langford (hereinafter "Plaintiffs"), by and through their counsel, respectfully move this Court to admit James S. Reece, *pro hac vice*, as co-counsel for Plaintiffs in the above-captioned matter. In support of this motion, Plaintiffs state the following:

1. Mr. Reece has been admitted to practice in the bar of the State of Minnesota and is a member in good standing of that bar. *See* Affidavit of James S. Reece at ¶ 2 (hereinafter "Reece Affidavit").

2. There are no disciplinary proceedings pending against Mr. Reece in the State of Minnesota, or in any other jurisdiction in which Mr. Reece is admitted to the bar. *See* Reece Affidavit at ¶ 3.

3. Mr. Reece has reviewed and is familiar with the Local Rules of this Court. *See* Reece Affidavit at ¶ 4.

4. Mr. Reece is familiar with the Plaintiffs and the issues in this litigation. *See* Reece Affidavit at ¶ 5.

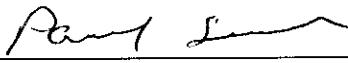
5. The undersigned movant is an attorney with the law firm of Zelle, Hofmann, Voelbel, Mason & Gette and is a member in good standing of the bar of this Court.

6. Counsel for Defendants, Edgar B. Hatrick, has assented to this motion.

WHEREFORE, Plaintiffs respectfully move this Court to admit *pro hac vice* James S. Reece for the purpose of participating as co-counsel for Plaintiffs in this litigation.

Dated: 3/10/04

**ZELLE, HOFMANN, VOELBEL, MASON & GETTE
LLP**

By: 
Wm. Gerald McElroy, Jr. (BBO #332500)
Paul T. Sullivan (BBO #659413)
950 Winter Street
Suite 1300
Waltham, MA 02451
(781) 466-0734

ATTORNEYS FOR PLAINTIFFS

CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), I, Paul T. Sullivan, hereby certify that counsel for the Defendants have been conferred with and have assented to this Motion.

Paul T. Sullivan

Paul T. Sullivan

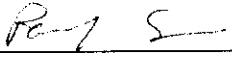
CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of March, 2004, I served a copy of the foregoing Assented-To Motion for Admission Pro Hac Vice of James S. Reece by federal express:

Edgar B. Hatrick
Day, Berry & Howard LLP
260 Franklin Street
Boston, MA 02110

Francis H. Morrison III
Deborah S. Russo
Day, Berry & Howard LLP
CityPlace I
Hartford, CT 06103-3499

Matthew S. Elvin
Dahm & Elvin LLP
9604 Coldwater Road, Suite 201
Fort Wayne, IN 46825



Paul T. Sullivan